

Rowe v. Ray

Civil Action No. 3:19cv418

EXHIBIT J

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

**UHURU BARAKA ROWE,**

**Plaintiff,**

**v.**

**TRACY S. RAY, et al.,**

**Defendants.**

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**DECLARATION OF  
ATTORNEY BETH A. NORTON**

**Civil Action No. 3:19-cv-418**

Attorney Beth A. Norton declares:

On or about May 10, 2018, I became aware through my paralegal associate, Cori Bedois, that Uhuru Rowe's friends and family members had not heard from him or been able to reach him for a few weeks. I called Sussex II State Prison and left three messages over the next two days to inquire about his status. I finally received a return call on the third day from a woman (I believe named either Debbie or Linda) who told me on that call that the entire facility had been on lockdown for a week and a half. She assured me that there was nothing going on with Mr. Rowe personally and that his family and friends should hear from him again very soon.

I relayed the message to my paralegal Cori Bedois. About two days later, Ms. Bedois let me know that this information was false and that another inmate at the prison had confirmed to her that Mr. Rowe had, in fact, been placed in solitary confinement. That day, May 14, 2018, I sent Mr. Rowe an engagement letter that would create an official attorney/client relationship and that offered my help. Ms. Bedois indicated to me that it was believed that Mr. Rowe had been placed in solitary confinement as a result of his

political activism, including exposing prison conditions to outsiders through various writings.

I received the signed engagement letter from Mr. Rowe a few days later, as well as a letter from him confirming that he had been placed in solitary confinement, had been given no reason for his isolation, had not been allowed to attend the hearing regarding his solitary confinement, and reiterating his belief that he had been isolated as a result of his activism.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 7<sup>th</sup> day of April, 2020

A handwritten signature in black ink, appearing to be 'Beth A. Norton', is written over a horizontal line.

Beth A. Norton  
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**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

**UHURU BARAKA ROWE,**

**Plaintiff,**

**v.**

**TRACY S. RAY, T.L. BIRCKHEAD,  
B. PERKINS, K. CLARK, MICHELLE  
CARPENTER, NATASHA  
PERKERSON, C. COLEMAN, L.  
SHAW, L. TAYLOR, and M.  
BRADLEY**

**Defendants.**

# SUMMONS

**Civil Action No. 3:19-cv-418**

TO THE ABOVE-NAMED DEFENDANTS:

You are hereby summoned and required to serve upon Plaintiff, whose address is Greenville Correctional Center, 901 Corrections Way, Jarratt, Virginia 23870, an answer to the Complaint which is herewith served upon you within \_\_\_\_ days after service of this Summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the Complaint. You must also file your answer with the clerk of this court within a reasonable period of time after service.

Clerk of the Court

Date \_\_\_\_\_

(By) Deputy Clerk